

Barber Foods)	Departmental
Cumberland County)	Findings of Fact and Order
Portland, Maine)	Air Emission License
A-569-71-H-M)	Amendment #3

After review of the air emissions license minor revision application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Barber Foods (Barber) was issued Air Emission License A-569-71-E-A/R on April 1, 1999, permitting the operation of emission sources associated with their frying lines and ovens, located in Portland, Maine. The license was subsequently amended on August 29, 2001 (A-569-71-F-M) and again on August 26, 2003 (A-569-71-G-M).

Barber has requested an amendment to their license for the permanent installation of two 10.5 MMBtu/hr heater units to be used for sanitation purposes. This amendment also includes corrected ton per year emissions from the facility.

B. Fuel Burning Equipment

Barber is authorized to operate the following air emission units:

Revised Fuel Burning Equipment List

<u>Equipment</u>	<u>Type of Equipment</u>	<u>Date of Construction</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Fuel Type, %Sulfur</u>	<u>Maximum Firing Rate (i.e. gal/hr)</u>	<u>Stack #</u>
Unit #1	Boiler	1991	5.23	Natural Gas	4980 scf/hr	1
Unit #2	Boiler	1991	5.23	Natural Gas	4980 scf/hr	1
Unit #6	Fryer #1	1987	2.3	Natural Gas	2190 scf/hr	6 A,B
Unit #7	Fryer #3	1991	2.3	Natural Gas	2190 scf/hr	7 A,B
Unit #9	Oven	1991	2.2	Natural Gas	2095 scf/hr	9A,B,C
<i>Unit #22</i>	Boiler	1987	1.42	#2, 0.5%	10.0 gal/hr	22
Unit #23	Fryer #2	1996	2.4	Natural Gas	3000 scf/hr	23A&B
<i>Temporary Boiler</i>	Boiler	2002	4.2	#2, 0.35%	30.0 gal/hr	2T
Unit #24	Heater	2003	10.5	Natural Gas	10,194 scf/hr	24
Unit #25	Heater	2003	10.5	Natural Gas	10,194 scf/hr	25

Italics denotes equipment to be removed by March 1, 2004 (reference A-569-71-G-M).

Bold denotes new equipment.

C. Application Classification

The application for Barber includes the installation of new equipment. However, the increase in emissions from the facility will be less than 4.0 tons for a single pollutant and less than 8.0 for total regulated pollutants. Therefore, the license is considered to be a minor revision and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Air Regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new equipment and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Heaters

The new hot water heaters (Unit #23 and Unit #24) each fire natural gas and have a heat input capacity of 10.5 MMBtu/hr and are therefore subject to New Source Performance Standards (NSPS) Subpart Dc. BACT for the units is the following:

1. Emission rates for PM are based on BACT of 0.01 lb/MMBtu.
2. Use of natural gas.
3. SO₂, NO_x, CO and VOC emission data was based on manufacturer data.
4. Visible emissions from the stacks serving the hot water heaters shall each not exceed an opacity of 10 percent on a six (6) minute block average basis, except for no more than one (1) six (6) minute block averages in a 3-hour period.

C. Revised Annual Emission

Barber Foods has the following annual emissions, based on a 12 month rolling total firing no more than:

- 172,000,000 cubic feet of natural gas facility wide.
- 50,000 gallons of 0.5% sulfur #2 fuel oil in Boiler #22.
- 50,000 gallons of 0.35% sulfur #2 fuel oil in the Temporary Boiler.
- Fryers operating 16 hours/day, 5 days/week and 52 weeks/year.

Total Allowable Annual Emissions for the Facility
(used to calculate the annual license fee)

	PM	PM ₁₀	SO ₂	NO _X	CO	VOC
<u>Natural Gas</u>	0.89	0.89	0.09	8.86	1.77	0.27
<u>Boiler #22</u>	0.18	0.18	1.76	0.49	0.13	0.01
<u>Temporary Boiler</u>	0.18	0.18	1.23	0.88	0.25	0.09
<u>Fryer 6B</u>	3.20	3.20	--	--	--	0.64
<u>Fryer 7B</u>	3.64	3.64	--	--	--	0.73
<u>Fryer 9B</u>	1.10	1.10	--	--	--	0.21
<u>Fryer 9C</u>	1.10	1.10	--	--	--	0.21
<u>Fryer 23B</u>	6.41	6.41	--	--	--	1.29
<u>Total TPY</u>	16.7	16.7	3.1	10.2	2.2	3.4

ORDER

The Department hereby grants Air Emission License Amendment A-569-71-H-M, subject to the conditions found in Air Emission License A-569-71-E-A/R, amendment A-569-71-F-M and in addition to the following conditions:

The following condition shall replace Condition (23) of Air Emission License A-569-71-E-A/R

(23) Fuel use (based on a 12 month rolling total) shall be limited to:

- 172,000,000 cubic feet of natural gas facility wide;
- 50,000 gallons of #2 fuel oil (0.5% sulfur by weight maximum) in Boiler #22;
- 50,000 gallons of #2 fuel oil (0.35% sulfur by weight maximum) in the Temporary Boiler.

Compliance with the fuel use limits shall be demonstrated by receipts from the supplier documenting the quantity of fuel delivered (maintained on a 12-month rolling total). The records for the #2 fuel oil shall include fuel percent sulfur as documented by receipts.

The following are new conditions to Air Emission License A-569-71-E-A/R

(31) Unit #23 and Unit #24

A. Emissions from Unit #23 and Unit #24 shall each not exceed the following:

<u>Pollutant</u>	<u>lb/MMBtu</u>	<u>lb/hr</u>
PM	0.01	0.11
PM ₁₀	n/a	0.11
SO ₂	n/a	0.01
NO _x	n/a	0.75
CO	n/a	0.79
VOC	n/a	0.08

B. Visible emissions from Stack #23 and Stack #24 each shall not exceed an opacity of 10 percent on a six (6) minute block average basis, except for no more than one (1) six (6) minute block averages in a 3-hour period.

(32) NSPS Requirements for Unit #23 and Unit #24

Units #23 and #24 are subject to Federal New Source Performance Standards, Subpart Dc. Barber shall comply with all requirements of 40 CFR Part 60, Subparts A and Dc as applicable including, but not limited to, the following:

- A. Barber shall submit notification to EPA and the Department of the date of Units #23 and #24 construction, anticipated start-up (no later than 30 days after such date), and actual start-up (postmarked within 15 days after such date). This notification shall include the design heat input capacity of the boiler and the type of fuel to be combusted.
- B. Barber shall record and maintain records of the amounts of fuel combusted in each unit on a daily basis.
- C. Barber shall submit to EPA and the Department semi-annual reports. These reports shall include the calendar dates covered in the reporting period and records of fuel supplier certifications. The semi-annual reports are due within 30 days of the end of each 6-month period.
- D. The following address for EPA shall be used for any reports or notifications required to be copied to them:

Compliance Clerk
USEPA Region 1
1 Congress Street
Suite 1100
Boston, MA 02114-2023

(33) **A. Annual Emission Statement**

In accordance with MEDEP Chapter 137, the licensee shall annually report to the Department by September 1, the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department;
or
- 2) A written emission statement containing the information required in MEDEP Chapter 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017

Phone: (207) 287-2437

- (34) This amendment shall expire concurrently with Air Emission License A-569-71-E-A/R.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2003.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 6, 2003

Date of application acceptance: August 20, 2003

Date filed with the Board of Environmental Protection: _____

This Order prepared by Mark E. Roberts, Bureau of Air Quality.